

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

NICHOLAS BERGERON and BARBARA  
MYCEK, individually and on behalf of others  
similarly situated,

Plaintiffs,

v.

ROCHESTER INSTITUTE OF TECHNOLOGY,  
  
Defendant.

Case No. 6:20-cv-06283

**SUPPLEMENTAL DECLARATION OF QIAN (SHEILA) SHEN  
IN SUPPORT OF ROCHESTER INSTITUTE OF TECHNOLOGY'S  
MOTION FOR SUMMARY JUDGMENT**

I QIAN (SHEILA) SHEN, declare:

1. I am an associate with the law firm Holland & Knight LLP. I am one of the attorneys for Defendant Rochester Institute of Technology ("RIT") and accordingly am familiar with the facts of this case and the documents attached hereto.

2. Attached as Exhibit 1 is a true and correct copy of supplemental excerpts from the deposition of Nicholas Bergeron ("Bergeron Deposition") taken on November 4, 2021.

3. Attached as Exhibit 2 is a true and correct copy of supplemental excerpts from the deposition of Milagros Concepcion ("Concepcion Deposition") taken on March 23, 2022.

4. Attached as Exhibit 3 is a true and correct copy of supplemental excerpts from the deposition of Edward Lincoln ("Lincoln Deposition") taken on March 29, 2022.

I declare under penalty of perjury and under the laws of the United States that the foregoing is true and correct. Executed this 18th day of November 2022, in Los Angeles, California.

/s/ Qian Shen  
Qian (Sheila) Shen